



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
OFFICE OF ENVIRONMENTAL ASSISTANCE  
SMALL BUSINESS ENVIRONMENTAL ASSISTANCE PROGRAM  
401 CHURCH STREET, 8<sup>TH</sup> FLOOR, L&C ANNEX  
NASHVILLE, TN 37243-1551

## **Immediate Attention Required**

[**Not** for sources in Shelby, Davidson, Knox and Hamilton Counties-check with your local air program]

### **New Federal Rule Affecting Paint Stripping, Autobody Refinishing and Miscellaneous Surface Coating Operations at Area / Small Sources**

**Affected Sources must submit an Initial Notice by January 11, 2010**

December 2009

Dear Supplier or Manufacturer:

On January 9, 2008, the U.S. Environmental Protection Agency published rules to reduce air toxics including methylene chloride and other Hazardous Air Pollutants (HAPs) *from surface coating operations at area/small sources.*

A facility is an area source\* affected by the rule if it falls into one or more of the following categories:

1. Paint stripping operations that use methylene chloride for the removal of dried paint
2. Motor vehicle (Autobody) and mobile equipment spray coating operations
3. Miscellaneous surface coating operations (All of the following must apply):
  - Perform hand-held spray painting
  - Spray paint metal, plastic or a combination of the two
  - Use surface coating material that contain chromium, lead, manganese, nickel, or/and cadmium

*\*An area source is a source that does not have the potential to emit more than 10 tons or more per year of a single HAP or 25 tons or more of a combination of one or more HAPs or 100 tons or more per year of a criteria pollutant.]*

**An affected facility must fall into one of the above categories.  
No action is needed if not one of the three categories above.**

The most significant rule requirements include:

- All painters must complete and receive certification from a training course on proper application of hand-held spray surface coatings and the proper set up and maintenance of spray equipment.
- Spray painting must be conducted in a booth.
- Painters must use HVLP spray guns or equivalents.
- Specific spray gun cleaning requirements

Rule compliance dates are:

- New Operations [started after September 17, 2007] (New)
  - Must be in compliance with the new rules upon start-up
  - Must submit an Initial Notification and Notification of Compliance Status no later than 180 days after initial start-up (Call 1800-734-3619 for additional new source information)
- Existing Operations [started on or before September 17, 2007]
  - Must submit an Initial Notification no later than **January 11, 2010**
  - Must be in compliance by January 10, 2011
  - Must submit a Notification of Compliance Status on or before March 11, 2011

Sources have a year to comply with the rule requirements, if affected  
**Affected sources must submit an Initial Notice no later than January 11, 2010**

Obtain a sample **Initial Notification** at:

[http://www.tn.gov/environment/ea/sbeap/sbeap\\_paintstr.shtml](http://www.tn.gov/environment/ea/sbeap/sbeap_paintstr.shtml)

A brochure is included in the packet that summarizes the rule's requirements and exemptions. The facility can review the brochure to see if the rule will affect it. The only action needed at this time is the submittal of the information included on the enclosed sample Initial Notification. Affected facilities are required to provide the information, which informs the regulatory program that the rule affects you.

The Small Business Environmental Assistance Program (SBEAP) is attempting to contact the vast number of groups/categories potentially affected by this rule. The SBEAP is a government assistance Program without enforcement authority that provides free and confidential assistance to small businesses.

Please assist our program in spreading this information as well as the announcement of the **Workshops for Autobody/Collision Repair Facilities** to your customers. **The workshops are scheduled December 8 – 11, 2009** (See enclosed announcement flyer).

Additional information is available at the SBEAP's Surface Coating and Paint Stripping webpage:  
[http://www.tn.gov/environment/ea/sbeap/sbeap\\_paintstr.shtml](http://www.tn.gov/environment/ea/sbeap/sbeap_paintstr.shtml)

For assistance in meeting these new requirements your customers may contact **Sharon Goodwin-Walker** with the Small Business Environmental Assistance Program at **1-800-734-3619 or by e-mail at BGSBEAP@tn.gov**.

Sincerely,

*Linda F. Sadler*

Linda F. Sadler, Advocate  
Tennessee Small Business Environmental Assistance Program

Enclosures